

USDC - BALTIMORE
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ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

Between 1996 and 2015, the Defendant, Ana Elizabeth Molina (“MOLINA”), then a national of El Salvador and lawful permanent resident of the United States, lived in Rock Creek Terrace Apartments with her family. Their housing was funded through the Department of Housing and Urban Development. Their eligibility for the program and the amount of their rent payment was determined based upon a yearly calculation of their income and any other assets they owned. MOLINA had to sign an annual recertification form wherein she was required to disclose her income and assets. Between 2012 and 2015, MOLINA filled out those recertification forms fraudulently by failing to accurately reflect her income and assets.

MOLINA indicated in those forms that she made no salary, relied upon her husband’s income, that she relied upon her husband for transportation, and that she had no money in bank accounts. In fact, during this period MOLINA was both employed and had financial assets in bank accounts she controlled. In 2013 she had a bank account with a balance of approximately \$9,900. In 2014, \$300,000 was deposited into MOLINA’s bank account. MOLINA also failed to disclose the purchase of a 2014 Toyota Highlander that had been paid for by Gustave Shapiro, the elderly widower for whom she worked as a home health aide beginning no later than September 2012. MOLINA also failed to disclose the fact that Mr. Shapiro’s money had been used to pay for her daughter’s college tuition.

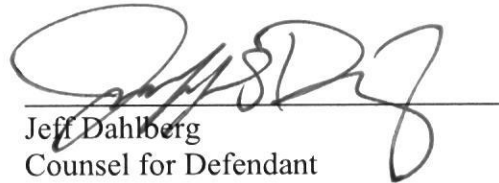
On August 4, 2015, MOLINA applied for United States citizenship by submitting a Citizenship and Immigration Services (USCIS) Form N-400 for review. On that form, which MOLINA certified as true and correct under penalty of “the laws of the United States of America,” MOLINA claimed she had never “committed, assisted in committing, or attempted to commit, a crime or offense for which you were **not** arrested” and further failed to disclose her employment with Mr. Shapiro. On December 17, 2015, in a sworn personal interview with a USCIS officer in Baltimore, Maryland, MOLINA repeated these falsehoods by expressly claiming that she was unemployed and affirming that she had never committed a crime for which she had not been arrested.

In December 2017, MOLINA pled guilty in Montgomery County, Maryland, to a theft scheme over the value of \$10,000 between 2012 and 2015 based upon her receipt of HUD housing subsidies in reliance upon these false recertification forms. MOLINA’s omission of this criminal conduct on her N-400 and during her naturalization interview was contrary to law and material to her procurement of naturalization.

SO STIPULATED:


Adam K. Ake
Assistant United States Attorney
Ana E. Molina
Defendant

I am Ana Molina's attorney. I have carefully reviewed the statement of facts with the defendant. Furthermore, I translated or caused to be translated this attachment/statement of facts from English into Spanish for the defendant.


Jeff Dahlberg
Counsel for Defendant